

UNITED STATES DISTRICT
COURT
SOUTHERN DISTRICT OF
NEW YORK
UNITED STATES OF
AMERICA,
-against- HO WAN KWOK,
a/k/a "Miles Guo,"
a/k/a "Miles Kwok,"
a/k/a "Guo Wengui,"
a/k/a "Brother Seven,"
a/k/a "The Principal,"
KIN MING JE,
a/k/a "William Je," and
YANPING WANG,
a/k/a "Yvette,"
Defendants
Judge Analisa Torres

Case No. 1:23-CR-118-1 (AT)

Motion to expel Geyer

Honorable Judge Torres, I once again apply for the court's special permission to allow me to express my appeal in the simplest terms. I present the complete chain of evidence and logic below. These evidence and logic may not be 100%, but they have already constituted a major suspicion!

Document 202

Motion Follows Same Pattern as Other Filings by Mr. Kwok's Associates, and Trustee Believes Funds In Question May Be Property of Chapter 11 Estate
Although not an issue for this Court to decide, the Trustee believes that Movants-like many parties before them-may very well be receiving direction from Mr. Kwok or his proxies, and the funds they seek to recover may rightfully be property of the estate. The Trustee bases this position on, among other things, the Bankruptcy Court's finding in its December 2022 preliminary injunction ruling in response to the protests and harassment against the Trustee and PAX that Himalaya Exchange is among a group of entities that "serve[s] the purposes of the Debtor, serve[s] as [a] business vehicle[] for the Debtor, and [its] members are personally loyal to the Debtor."⁷ The purported nominal leader of the Himalaya Exchange is Mr. Kwok's alleged co-conspirator, William Je, who allegedly lent Mr. Kwok's daughter \$37 million early in the bankruptcy case through an entity named Himalaya International Financial Group Ltd. in an effort to help her keep Mr. Kwok's luxury yacht (which the Trustee subsequently established was property of the estate) away from his creditors. Mr. Kwok's daughter affectionately called Mr. Je "Uncle William" in her testimony. Moreover, the Trustee has recently learned that a prominent supporter of the Debtor nicknamed "Little Sarah"-who, among other things, has referred to Mr. Kwok as "Uncle Guo," has dined with him at his

luxury New York City apartment, has sailed on one of his yachts, and participated in the protests-used her social media account to introduce investors in the Himalaya Exchange to Mr. Geyer so he could seek purported relief on their behalf in exchange for a one percent commission on fees recovered.⁸ As noted above, this tactic and practice of Mr. Kwok's followers mobilizing as purported claimants is one Defendant Kwok has employed, and the Trustee has seen, before. Movants' suggestion that they have no relationship to Mr. Kwok and that the exchange funds cannot possibly be property of the estate is untethered from both the facts and the law. Among Movants' flawed legal positions is their attempt to analogize the Himalaya Exchange to a bank holding customer deposits, contending that such deposits are not the bank's property.⁹ But this statement is wrong, because a bank does own the deposits, with its depositors holding unsecured claims against the bank. The same may very well be true with any alleged customer funds in the Himalaya Exchange. Indeed, among the \$1.2 billion in claims that have been asserted against Mr. Kwok in the Bankruptcy Court to date are many claims allegedly held by the exact types of Himalaya Exchange customers Movants purport to represent. This tends to undermine the notion that the funds Movants seek to recover are not estate property.

Document 388

Farm Leaders
The Government further seeks to admit statements of several leaders of the Himalaya Farm Alliance: David Dai, Xia Qidong, Sara Wei, and Zhang Yongbing. There is sufficient evidence to find that each of these individuals were members of the conspiracies related to the Farms. Dai was the leader of the Farm based in the United Kingdom. Tr. at 384:24-25. Xia served as the leader of the Mountain of Spices ("MOS") Farm and as the Alliance secretary. Id. at 1373:19-1347:8, 1387:10-18. Wei led the Phoenix Farm. Id. at 2500:18-19. And, Zhang was the "legal group leader" of the Mountain of Spices Farm and a member of the Iron Blood Group.⁴ Id. at 2403:3-15.5

Guo selected each of these individuals to lead their respective Farms and in turn, they carried out his instructions in managing the Alliance. Tr. at 406:15-17, 2500:20-23. In their roles, the Farm leaders furthered the alleged G Enterprise conspiracies. Dai, for example, directed Le Zhou to open bank accounts to collect H Coin investments and instructed him "where to send the money." Id. at 263:9-266:9. Xia helped to execute Farm Loan and H Coin agreements with investors and directed Ya Li to delete incriminating content after Guo's arrest. Id. at 1501:14-24, 2395:1-2397:20, 2421:1-19. Wei facilitated investments in the GTV Private Placement through Voice of Guo. Id. at 204:6-205:5. And, Zhang directed Ya Li to sign a false affidavit and sue the trustee as part of Guo's bankruptcy proceedings, and threatened her when she refused to do so. Id. at 1522:7-1523:19. Based on this evidence as well as other documents and testimony introduced at trial, the Court finds that the Government has met its burden on the Geaney prerequisites as to the Farm leaders' statements identified in Exhibit A

According to the court order in court file 388 and Luc's questioning of Geyer in file 202, the logic chain and the chain of evidence seem to have been closed. I have every reason to suspect that Geyer may be one of the suspected accomplices or that Geyer was used by the suspected accomplices!

Conclusion

I ask the Judge to immediately declare that the agreements registered by thousands of customers of Himalaya Exchange are suspected of conspiracy, and suggest that the Judge immediately expel Geyer from the court.
For the prosecutor, I suggest that the prosecutor immediately support my motion, and I suggest that the prosecutor immediately open a criminal investigation against Geyer.

Perhaps many American taxpayers are watching this criminal case, and I hope Judge Torres and the prosecutor can make the right choice.

Please, prosecutors, judges, Geyer, respond immediately after receiving my motion

Sincerely

Chunk Chyi



baoliao2019@gmail.com
Building 1, Yard 4, South
Third Ring Road West,
Fengtai District,
Beijing, China
<https://x.com/baoliaogeming?s=09>
86-10-67526666
March 28, 2025